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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 SHELLEY BETH RAEBEL, an individual;
9 PAUL RITCHIE WAGNER, an individual

10 Plaintiff(s),

11 vs.

12 TESLA, INC. a Delaware corporation;
13 DOES 1-10 Inclusive

14 Defendant(s).

Case #319cv00742-MMD-WGC

VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL

FILING FEE IS \$250.00

15
16 Neil M. Kliebenstein, Petitioner, respectfully represents to the Court:
(name of petitioner)

17 1. That Petitioner is an attorney at law and a member of the law firm of

18 Bowman and Brooke LLP

19 (firm name)

20 with offices at 1741 Technology Drive, Suite 200
(street address)

21 San Jose

22 (city)

California

(state)

95110

(zip code)

23 408.279.5393

(area code + telephone number)

neil.kliebenstein@bowmanandbrooke.com

(Email address)

24 2. That Petitioner has been retained personally or as a member of the law firm by

25 Tesla, Inc.

26 [client(s)]

to provide legal representation in connection with

27 the above-entitled case now pending before this Court.
28

1 6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give
2 particulars if ever denied admission):

3 None.
4
5

6 7. That Petitioner is a member of good standing in the following Bar Associations.

7 Minnesota (Inactive), California.
8
9

10 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

12 Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
13			
14	None		
15			
16			
17			
18			

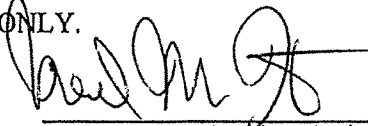
19 (If necessary, please attach a statement of additional applications)

20 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the
21 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same
22 extent as a member of the State Bar of Nevada.

23 10. Petitioner agrees to comply with the standards of professional conduct required of
24 the members of the bar of this court.

25 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to
26 practice in this jurisdiction and that the client has consented to such representation.
27
28

1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
2 FOR THE PURPOSES OF THIS CASE ONLY.



Petitioner's signature

3
4 STATE OF California }
5 COUNTY OF Santa Clara }

6
7 Neil M. Kliebenstein, Petitioner, being first duly sworn, deposes and says:

8 That the foregoing statements are true.



Petitioner's signature

9
10 Subscribed and sworn to before me this

11
12 _____ day of _____,

13
14 _____
15 Notary Public or Clerk of Court

16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO**
17 **THE BAR OF THIS COURT AND CONSENT THERETO.**

18 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
19 believes it to be in the best interests of the client(s) to designate Wayne A. Shaffer,
20 (name of local counsel)
21 Attorney at Law, member of the State of Nevada and previously admitted to practice before the
22 above-entitled Court as associate resident counsel in this action. The address and email address of
23 said designated Nevada counsel is:

24 9790 Gateway Drive, Suite 200,

(street address)

25 Reno,

(city)

Nevada,

(state)

89521,

(zip code)

775-322-1170

(area code + telephone number)

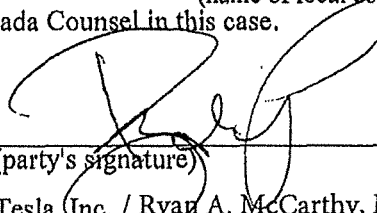
wshaffer@laxalt-nomura.com,

(Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.

4
5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6
7 The undersigned party(ies) appoint(s) Laxalt & Nomura, Ltd. as
8 his/her/their Designated Resident Nevada Counsel in this case.
(name of local counsel)

9
10 
(party's signature)

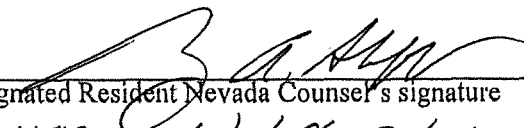
11 Tesla, Inc. / Ryan A. McCarthy, Managing Counsel
12 (type or print party name, title)

13
14 (party's signature)

15
16 (type or print party name, title)

17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.


19
20 
Designated Resident Nevada Counsel's signature

21 1579
22 Bar number

23 W. Shaffer @ LAXALT-NOMURA.COM
24 Email address

25 **APPROVED:**

26 Dated: this 14th day of January, 2020.

27 
UNITED STATES DISTRICT JUDGE

JURAT

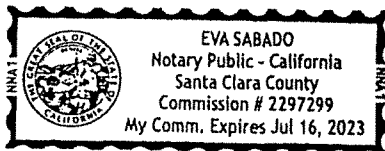
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this Certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara } SS.

Subscribed and sworn to (or affirmed) before me on this 10th day of January, 2020 by

Neil M. Kliebenstein, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Eva Sabado
NOTARY'S SIGNATURE

PLACE NOTARY SEAL IN ABOVE SPACE

OPTIONAL INFORMATION

The information below is optional. However, it may prove valuable and could prevent fraudulent attachment of this form to an unauthorized document.

CAPACITY CLAIMED BY SIGNER (PRINCIPAL)

- ☐ INDIVIDUAL
☐ CORPORATE OFFICER _____ TITLE(S)
☐ PARTNER(S)
☐ ATTORNEY-IN-FACT
☐ TRUSTEE(S)
☐ GUARDIAN/CONSERVATOR
☐ OTHER: _____

DESCRIPTION OF ATTACHED DOCUMENT

TITLE OR TYPE OF DOCUMENT

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DATE OF DOCUMENT

ABSENT SIGNER (PRINCIPAL) IS REPRESENTING:
NAME OF PERSON(S) OR ENTITY(IES)

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THUMBPRINT
OF
SIGNER

OTHER

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The State Bar
of California

OFFICE OF ATTORNEY REGULATION
& CONSUMER RESOURCES

180 Howard Street, San Francisco, CA 94105

888-800-3400

AttorneyRegulation@calbar.ca.gov

CERTIFICATE OF STANDING

January 7, 2020

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, NEIL MATTHEW KLIEBENSTEIN, #226060 was admitted to the practice of law in this state by the Supreme Court of California on July 7, 2003 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Dina DiLoreto
Custodian of Records

1 CERTIFICATE OF SERVICE

2 Pursuant to FRCP 5(b) and Section IV of the District of Nevada Electronic Filing Procedures, I
3 hereby certify that I am an employee of LAXALT & NOMURA, LTD., and that I caused to be served a
4 true and correct copy of the foregoing document by E-Service by filing the foregoing with the Clerk of
5 Court using the CM/ECF system, which will electronically mail the filing to the following email
6 addresses:
7

8 Jake Y. Jung (SBN 14891)
9 Law Offices of Yohan Lee
10 5681 Beach Boulevard, Suite 200
Buena Park, California 90621
jakejung@leelaw.com

11 Daniel T. Hayward (SBN 5986)
12 Bradley Drendel & Jeanney
13 P.O. Box 1987
Reno, Nevada 89505
danhayward@bdjlaw.com

14 DATED this 14 day of January, 2020.

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16 
17 LAURIE PIERATT
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